

1 EDMUND G. BROWN JR.
Attorney General of California
2 DIANN SOKOLOFF
Supervising Deputy Attorney General
3 SUSANA A. GONZALES
Deputy Attorney General
4 State Bar No. 253027
1515 Clay Street, 20th Floor
5 P.O. Box 70550
Oakland, CA 94612-0550
6 Telephone: (510) 622-2221
Facsimile: (510) 622-2270
7 E-mail: Susana.Gonzales@doj.ca.gov
Attorneys for Complainant

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9 **BEFORE THE**
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. *2011-460*

12 **GERALD HALILI ROMERO**
13 **2175 Decoto Road, Apt #174**
14 **Union City, CA 94587**
Registered Nurse License No. 555501

A C C U S A T I O N

15 Respondent.

16
17 Complainant alleges:

18 PARTIES

19 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
20 official capacity as the Interim Executive Officer of the Board of Registered Nursing, Department
21 of Consumer Affairs.

22 2. On or about June 4, 1999, the Board of Registered Nursing issued Registered Nurse
23 License Number 555501 to Gerald Halili Romero (Respondent). The Registered Nurse License
24 was in full force and effect at all times relevant to the charges brought in this Accusation and will
25 expire on December 31, 2010, unless renewed.
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1 address; (6) within the first year of the Order, attend at least one meeting of the Nevada Board
2 during which disciplinary hearings are held; (7) obtain written approval of the Nevada Board of
3 all nursing employment sites; (8) notify the Nevada Board within 72 hours after commencement
4 or termination of any nursing employment; (9) work under the direction of a registered nurse;
5 (10) not function as supervisor for at least one year and only with the approval of the Nevada
6 Board; (11) not work more than 90 hours in nursing in a two-week period; (12) provide a copy of
7 the Order to all employers and immediate supervisors prior to the commencement of work;
8 (13) cause his nursing supervisor to submit a written report prior to the commencement of
9 employment; (14) cause his nursing supervisor to submit monthly written reports to the Nevada
10 Board, addressing Respondent's work attendance, reliability, ability to carry out assigned nursing
11 functions, and ability to handle stress; (15) submit monthly self-reports on his progress, his ability
12 to handle stress, his mental and physical health, his current job duties, and his ability to safely
13 practice nursing; (16) meet with the Nevada Board or staff upon request; (17) assume financial
14 responsibility for all requirements of the Order; (18) provide a copy of the Order to any other
15 state Board of Nursing in whose jurisdiction he has been issued a nursing license or certificate,
16 whether current or not; (19) provide a copy of the Order to any other state Board of Nursing in
17 whose jurisdiction Respondent has applied or will apply for a license or certificate; and (20) obey
18 all laws and report any violations of law to the Nevada Board within 72 hours.

19 10. The underlying conduct supporting the Nevada Board's disciplinary action is that on
20 or about January 16, 2005, while employed at Desert Lane Care in Las Vegas, Nevada,
21 Respondent documented in the Medication Administration Record that he administered
22 medications for the following day, January 17, 2005. On or about January 23, 2005, while
23 working for the same employer, Respondent failed to document in the Medication Administration
24 Record that he administered medication to eight patients. On this same date, Respondent used a
25 piece of paper from a patient's bedside as a bandage after he pricked the patient's finger.
26 Respondent also failed to address this patient's concerns about her blood sugar and insulin
27 administration. Moreover, Respondent removed a portable radio from the dining room and
28 placed it in the nurses' station, then played music so loudly that it was heard in the patient rooms.

1 Respondent sat at the nurses' station listening to the radio while four of his patients requested
2 pain medication. Finally, Respondent failed to properly communicate with a Certified Nursing
3 Assistant (CNA) on duty. According to the CNA, Respondent asked her to administer medication
4 to one of his patient's.

5 PRAYER

6 WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this
7 Accusation, and that following the hearing, the Board of Registered Nursing issue a decision:

8 1. Revoking or suspending Registered Nurse License Number 555501, issued to Gerald
9 Halili Romero;

10 2. Ordering Gerald Halili Romero to pay the Board of Registered Nursing the
11 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
12 Professions Code section 125.3;

13 3. Taking such other and further action as deemed necessary and proper.
14

15 DATED: November 15, 2015 Louise L. Bailey
16 LOUISE R. BAILEY, M.ED., RN
17 Interim Executive Officer
18 Board of Registered Nursing
19 Department of Consumer Affairs
20 State of California
21 Complainant

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